



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

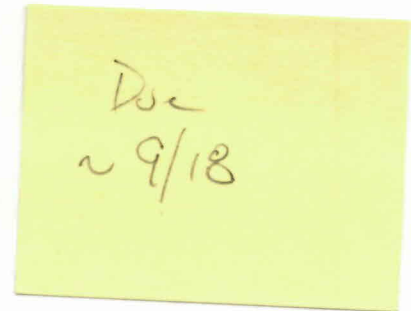
REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

SEP 8 1992

Mr. Frank Agnelli
Plant Manager
E.J. Brooks Company
P.O. Box 7070
164 North 13th Street
Newark, New Jersey 07107



Dear Mr Agnelli:

This letter is in response to a question raised as a result of an inspection, at E.J. Brooks Company (EJ Brooks), conducted on August 25, 1992. The question concerns the regulatory status of EJ Brooks under the Resource Conservation and Recovery Act (RCRA) and implementing hazardous waste regulations. A baghouse unit is currently being installed, for the lead shop. The dust collected by the baghouse would be considered K069, a listed hazardous waste. K069 is defined, under 40 C.F.R. § 261.32, as emission control dust from secondary lead smelting.

Please provide the following information:

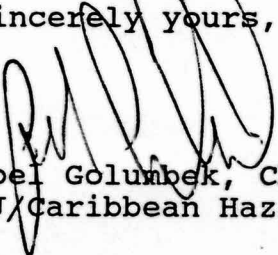
1. What is the estimate of the amount, on a monthly basis, of dust to be collected from the operation of the baghouse unit? *3 lb/mo*
2. What is the intended method of disposal for the dust to be collected from the operation of the baghouse unit? *- collect in hopper*

The information requested should be provided within five (5) business days of the receipt of this letter and should be mailed to the following address:

Mr. Bartholomew George
Environmental Engineer
Hazardous Waste Compliance Branch
Air and Waste Management Division
U.S. E.P.A. - Region II
26 Federal Plaza, Room 1000H
New York, New York 10278

If you should have any further questions regarding this matter,
please contact Mr. Bart George, at (212) 264-9587.

Sincerely yours,



Joel Golumbek, Chief
NJ/Caribbean Hazardous Waste Compliance Section